

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI

ROBERT SCHLATTMANN,	)	
	)	Case No.: 4:16-cv-01183 SNLJ
Plaintiff,	)	
	)	
v.	)	
	)	
PORTFOLIO RECOVERY	)	
ASSOCIATES, LLC	)	
	)	
	)	
Defendant.	)	

**Plaintiff's Motion to Compel First Interrogatories and  
Request for Production to Defendant**

COMES NOW Plaintiff, Robert Schlattmann, by and through undersigned counsel, and for its Motion to Compel Defendant, Portfolio Recovery Associates, LLC answers to Plaintiff's Interrogatories Nos: 2, 3, 5, 6, 7, 8, 10, 13 and Request for Production Nos. 1, 2, 3, 5, 8, 11, 12 and 17, states as follows:

1. Defendant's response to Plaintiff's First Interrogatories and Request for Production are insufficient, lack any specificity, were not properly objected to and/or answered. (See **Exhibit 1 & 2**).
2. Plaintiff's argument is more full set out in its Memorandum in Support filed contemporaneously and incorporated herein.

WHEREFORE, Plaintiff, Robert Schlattmann, respectfully requests that the Court Order Defendant to properly and fully answer and produce documents to Plaintiff's discovery requests within ten (10) days for such other relief as required under the circumstances.

By: /s/ Matthew P. Cook  
Cook Law, LLC  
Matthew P. Cook #62815  
Attorney for Plaintiff  
PO Box 220342  
St. Louis, Missouri 63122  
Phone: 314-200-5536  
Email: Cookmp21@yahoo.com

**CERTIFICATE OF SERVICE**

I certify that on the 17<sup>th</sup> day of January, 2017, a true and correct copy of the foregoing document was filed electronically with the Clerk of Court to be served by operating of the Court's electronic filing system upon the following counsel of record:

Josh Dickinson  
Kersten Holzhueter  
Attorneys for Defendant  
13520 California St, Suite 290  
Omaha, NE 68154  
[kholzhueter@spencerfane.com](mailto:kholzhueter@spencerfane.com)  
[jdickinson@spencerfane.com](mailto:jdickinson@spencerfane.com)

/s/ Matthew P. Cook  
Matthew P. Cook